

Exhibit B

Portland, ME

Augusta, ME

Concord, NH

Boston, MA

Washington, DC

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VIA EMAIL

Special Master Thomas P. Scrivo, Esq.
O'Toole Scrivo, LLC
14 Village Park Road
Cedar Grove, NJ 07009
tsrivo@oslaw.com

RE: Occidental Chemical Corp. v. 21st Century Fox America, Inc., et al.
Docket No. 2:18-cv-11273-MCA-LDW

Dear Special Master Scrivo:

As you may know, most of the Defendants have executed a settlement agreement with the United States relating to the Diamond Alkali Superfund Site at issue in this litigation. The United States lodged the resulting consent decree with the Court in *United States v. Alden Leeds, Inc.*, No. 2:22-cv-07326 (D.N.J. filed Dec. 16, 2022). All Defendants, including Third Party Defendants, filed a motion for a six-month stay of all proceedings while the Court evaluates the consent decree ("Motion"). ECF No. 2246. OxyChem does not oppose the requested stay.

While the Court is considering the Motion, all parties—including OxyChem—have agreed to stay all pending or scheduled discovery and discovery disputes, effective immediately. This temporary stay is intended to minimize the time and expense of continuing with discovery regarding claims or arguments that could soon be stayed by the Court.

Although the parties do not believe that any action is needed by the Special Master to effectuate their agreement to pause discovery while the Motion is pending, we are bringing the agreement to your attention in case you believe entry of an order is warranted. Counsel will make themselves available for a conference to discuss the temporary stay if the Special Master believes one is necessary.

Respectfully Submitted,



Jeffrey D. Talbert

cc: Counsel for OxyChem and Liaison Counsel